

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SONTERRA CAPITAL MASTER FUND, LTD., HAYMAN
CAPITAL MANAGEMENT, L.P., and CALIFORNIA STATE
TEACHERS' RETIREMENT SYSTEM on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

UBS AG, UBS SECURITIES JAPAN CO. LTD., MIZUHO
BANK, LTD., THE BANK OF TOKYO-MITSUBISHI UFJ,
LTD., THE SUMITOMO TRUST AND BANKING CO., LTD.,
THE NORINCHUKIN BANK, MITSUBISHI UFJ TRUST AND
BANKING CORPORATION, SUMITOMO MITSUI BANKING
CORPORATION, RESONA BANK, LTD., J.P. MORGAN
CHASE & CO., JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION, J.P. MORGAN SECURITIES PLC, MIZUHO
CORPORATE BANK, LTD., DEUTSCHE BANK AG, DB
GROUP SERVICES UK LIMITED, MIZUHO TRUST AND
BANKING CO., LTD., THE SHOKO CHUKIN BANK, LTD.,
SHINKIN CENTRAL BANK, THE BANK OF YOKOHAMA,
LTD., SOCIÉTÉ GÉNÉRALE SA, THE ROYAL BANK OF
SCOTLAND GROUP PLC, THE ROYAL BANK OF
SCOTLAND PLC, RBS SECURITIES JAPAN LIMITED, RBS
SECURITIES INC., BARCLAYS BANK PLC, BARCLAYS
PLC, BARCLAYS CAPITAL INC., CITIBANK, NA,
CITIGROUP, INC., CITIBANK, JAPAN LTD., CITIGROUP
GLOBAL MARKETS JAPAN, INC., COÖPERATIEVE
CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., HSBC
HOLDINGS PLC, HSBC BANK PLC, LLOYDS BANKING
GROUP PLC, LLOYDS BANK PLC, ICAP PLC, ICAP
EUROPE LIMITED, R.P. MARTIN HOLDINGS LIMITED,
MARTIN BROKERS (UK) LTD., TULLETT PREBON PLC,
BANK OF AMERICA CORPORATION, BANK OF AMERICA,
N.A., MERRILL LYNCH INTERNATIONAL, AND JOHN DOE
NOS. 1-50,

Defendants.

Docket No. 15-cv-5844

ECF Case

DECLARATION OF YOSHIKAZU KAWAGUCHI

1. My name is Yoshikazu Kawaguchi and I am employed by Resona Bank Ltd. ("Resona") in Tokyo, Japan as Chief Manager of the Treasury Division. I submit this Declaration in support of Resona's Motion to Dismiss for Lack of Personal Jurisdiction and Motion for Stay of Discovery. In my capacity as Chief Manager of the Treasury Division of Resona, I have confirmed the following matters and understand and believe them to be true. Unless otherwise noted, the facts set forth in this declaration describe Resona's business during the time period from January 1, 2006 until the present. I have been assisted by Resona's United States legal counsel in the phrasing of this Declaration.

2. Resona is a Japanese commercial bank established under the laws of Japan. Resona is headquartered in Osaka, Japan and has its principal offices in Tokyo and Osaka, Japan.

3. Resona manages its business from Tokyo and Osaka, Japan. Resona's directors and executive officers reside in Japan.

4. Resona is not registered or licensed to do business anywhere in the United States.

5. Resona does not have any offices, branches, or subsidiaries in the United States.

6. Resona has no officers or employees in the United States.

7. Resona has no telephone number or address in the United States.

8. Resona owns no real property in the United States.

9. As a commercial bank chartered under Japanese law and headquartered in Japan, Resona is regulated by the Japanese Financial Services Agency. Resona is not subject to regulation by any agency of the United States government.

10. The Japanese Bankers Association ("JBA") is a Japanese entity. Resona has served as a JBA Euroyen TIBOR panel bank since Resona's formation through the merger between Daiwa

Bank and Asahi Bank in 2003. Asahi Bank had been a Euroyen TIBOR panel bank from March 1998 until the merger.

11. Resona's employees responsible for submission of Euroyen TIBOR rate quotes are located in Japan.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 28th day of January, 2016, in Tokyo, Japan.


Yoshikazu Kawaguchi